

OBER | KALER
A Professional Corporation

Ober, Kaler, Grimes & Shriver
Attorneys at Law

120 East Baltimore Street
Baltimore, MD 21202-1643
410-685-1120 / Fax 410-547-0699
www.ober.com

Pamela J. White
pjwhite@ober.com
410-347-7323

Offices in
Maryland
Washington, D.C.
Virginia

June 10, 2004

VIA FACSIMILE AND U.S. MAIL

David L. Gollin, Esquire
David Landau, Esquire
WOLF, BLOCK, SCHORR AND SOLIS-
COHEN, LLP
1650 Arch Street, 22nd Floor
Philadelphia, Pennsylvania 19103

Re: *EEOC v. LA Weight Loss Centers - Civil No.: S-02-CV-648*

Gentlemen:

I attended and participated in the deposition of Dawn Lang at Norristown late into the evening of June 7, 2004. Among other things, Lang described her training duties and retention of training manuals used as Traveling Trainer in 1997-98, when she reported to Mmes. O'Brien and Stankunas. She described the Horsham file room in which her training materials were retained (for herself and O'Brien) in 1997-98 and even up to August 2002 when Lang destroyed her own collection of those training materials. I draw on Lang's testimony to ask that you please advise of the current location or disposition of the training file room contents.

Among the documents in Lang's personnel file (copies received and reviewed on June 7) was a personnel action/salary increase form reflecting that Vahan Karabajakian, Scott Moyer and Eileen Stankunas all met on May 4, 1998 (when they approved Lang's salary increase to \$50,000, according to Kristi O'Brien). Please advise whether any notes, diary references, minutes or other documents of any sort memorialize the fact or substance of that meeting.

O B E R | K A L E R
A Professional Corporation

David L. Gollin, Esquire
David Landau, Esquire
June 10, 2004
Page 2

I have reviewed the contents of your package of discovery documents transmitted by your letter dated May 28, 2004. Please advise me of the location(s) of the attached pages of Lynne Portlock's notes since its creation. Is the original available for my inspection? May I call Lynne Portlock to discuss the circumstances of the document and ask for her transcription?

Very truly yours,

A handwritten signature in black ink, appearing to read "Pamela J. White", with a stylized, flowing script.

Pamela J. White

PJW/cks

Enclosure

cc: Ronald Phillips, Esquire (w/enclosure)

* AAW: Karen
 Please get to Daniel

→ Use ~~terminating you~~ - thanks
you fast 30 you

↓ → ↓

for poor perform
 of honesty

(didn't follow up
 compare - learning
 - anger)

Wed - Stu M

complaint from
 manager must
 that they had to -
 stake them from
 before using eyes -

Request - de use asked
 - formal

OKal ~~AD~~

Refused (PS)

↓